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*Via ECF*

May 29, 2024

The Honorable Joan M. Azrack  
United States District Judge  
United States District Court  
Eastern District of New York  
100 Federal Plaza  
Central Islip, New York 11722

**Re: *United States v. Adam Kaplan and Daniel Kaplan,***  
**Index No. 23-CR-293 (JMA) (JMW)**

Dear Judge Azrack:

On behalf of Adam Kaplan, we respectfully join in co-defendant Daniel Kaplan's opposition to the designation of this case as "complex" for the purposes of the Speedy Trial Act.

Respectfully,

/s/ Eric M. Creizman  
Eric M. Creizman

cc: AUSAs Adam Toporovsky and Paul Scotti (by ECF)  
Michael Tremonte, Esq. (by ECF)